

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

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March 6, 2024

**VIA ECF**

The Honorable Jessica G. L. Clarke, U.S.D.J.  
U.S. District Court, Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

**MEMO ENDORSED**

Re: *Ruiz et al v. JHDHA, Inc. et al*  
**Case No.: 1:23-cv-07896-JGLC**

Dear Honorable Judge Clarke:

This law firm represents Plaintiff Enrique Ruiz (the “Plaintiff”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules<sup>1</sup>, this letter respectfully serves to request an extension of time to file Plaintiff’s Motion for Default Judgment as against Defendants JHDHA, Inc. and Angel Amigon (together, the “Defendants”) from March 6, 2024 to, through and including, April 6, 2024.

This is the Third request of its kind. If granted, this request would not affect any other Court-scheduled deadlines.

The basis for this request is that the undersigned law firm is still in the process of gathering information from Plaintiff in support of Plaintiff’s Motion for Default Judgment.

In light of the foregoing, Plaintiff respectfully requests an extension of time to file Plaintiff’s Motion for Default Judgment as against Defendants from March 6, 2024 to, through and including, April 6, 2024.

Thank you, in advance, for your time and attention to this matter.

The deadline for Plaintiff to file the motion for default judgment is hereby EXTENDED to **April 6, 2024**. No further extensions will be granted.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

Jason Mizrahi, Esq.

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New York, New York 10165

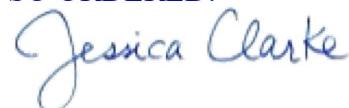
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Attorneys for Plaintiff

Dated: March 7, 2024  
New York, New York

SO ORDERED.

  
JESSICA G. L. CLARKE

United States District Judge

VIA ECF: All Counsel

<sup>1</sup> The undersigned respectfully wishes to apologize for the slight delay in making the instant application.